

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

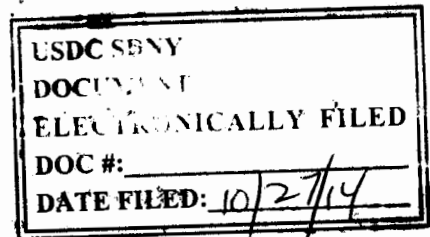
DEEP WOODS HOLDINGS LLC,

Plaintiff,

-against-

SAVINGS DEPOSIT INSURANCE FUND OF
THE REPUBLIC OF TURKEY

Defendant.



07 CV 934 (AKH)
STIPULATION

Plaintiff Deep Woods Holding LLC ("Deep Woods") and defendant Savings Deposit Insurance Fund of The Republic of Turkey ("SDIF") by and through their counsel, hereby stipulate and agree that:

1. Deep Woods commenced this action against SDIF in the United States District Court for the Southern District of New York, under Case No. 07 CV 934 (AKH) by filing a complaint on or about February 8, 2007.
2. The District Court awarded summary judgment to Deep Woods by order entered on or about October 29, 2009.
3. Following a damages trial, SDIF noticed its appeal of the District Court's summary judgment order to the Court of Appeals for the Second Circuit on or about April 13, 2011.
4. The Second Circuit reversed the District Court's judgment in a March 14, 2014 opinion and judgment and issued a mandate on August 18, 2014 remanding the case to the District Court with instructions to enter summary judgment in favor of SDIF and to

determine the attorney's fees, costs, and disbursements to be awarded to SDIF in accordance with the Second Circuit's opinion.

5. Deep Woods and SDIF hereby agree for the entry of a judgment by the District Court in the amount of \$1,300,000 in satisfaction of SDIF's claim for attorney's fees, costs and disbursements incurred in this litigation as of the date of this Stipulation, provided, however, that this Stipulation (a) is without prejudice to Deep Woods's Petition for Writ of Certiorari to the United States Supreme Court; (b) shall be void if the judgment is reversed, vacated or otherwise overturned; and (c) is expressly without waiver of any legally valid and properly asserted defenses or objections concerning enforcement of any judgment against Deep Woods.

6. Notwithstanding the reservations listed in Paragraph 5 above, SDIF does not waive and fully reserves its rights to enforce the judgment of \$1,300,000.

7. Upon the So Ordering of this Stipulation by this Court, SDIF will submit a proposed judgment for the award of \$1,300,000 for its attorney's fees, costs, and disbursements and withdraw its September 26, 2014 motion for attorney's fees, costs, and disbursements at the time of entry of such judgment.

8. This stipulation may be executed in counterparts, and that facsimile signatures herein shall have the same force and effect as original signatures.

Dated: New York, NY
October 23, 2014

PRYOR CASHMAN LLP

By: 

James S. O'Brien, Jr.
(jobrien@pryorcashman.com)
Ross M. Bagley
(rbagley@pryorcashman.com)
7 Times Square
New York, New York 10036
212-421-4100

*Attorneys for Plaintiff
Deep Woods Holdings LLC*

Dated: Washington, DC
October 23, 2014

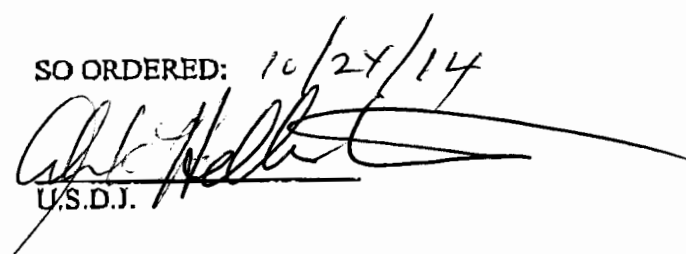
GORDON REES SCULLY
MANSUKHANI LLP

By: 

Ronan J. McHugh
(rmchugh@gordonrees.com)
700 12th Street, NW
Suite 1050
Washington, D.C. 20005
202-399-1009

*Attorneys for Defendant Savings Deposit
Insurance Fund of The Republic of
Turkey*

SO ORDERED: 10/24/14


U.S.D.J.